Exhibit 1

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc Exhibit 1 Page 2 of 10

From: Pavel, Ashley

Sent: Wednesday, July 24, 2019 3:09 PM

To: Herring, Angela K.; Clark, Brandon C.; Bassett, Nicholas A. (Paul Hastings LLP)

Cc: Brian.Liegel@weil.com; Debora.Hoehne@weil.com; gregory.silbert@weil.com;

Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP); Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil,

Gotshal & Manges LLP); Moshe.Fink@weil.com;

National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP); Bongartz, G. Alexander (Paul Hastings LLP); Tenzer, Andrew V. (Paul Hastings LLP); Bliss, James R. (Paul Hastings LLP); Worthington, James B. (Paul Hastings LLP); lucdespins@paulhastings.com; Comerford, Michael (Paul Hastings LLP); Jimenez, Pedro; Zwillinger, Zachary S.; Wolf, Amy R.; Kleinhaus, Emil A.; Celentino, Joseph C.; Lynch, John F.; Mason, Richard G.; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP); sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP); Baker, Nicolas (Simpson Thacher & Bartlett LLP); Qusba, Sandeep (Simpson Thacher & Bartlett LLP); notificaciones@bufeteemmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; Ift@tcm.law; mfb@tcm.law; nperez@tcm.law; ebarak@proskauer.com; Carino, Elisa M.; Mashberg, Gregg M. (Proskauer Rose LLP); Jones, Jennifer L.; Geary, Laura M.; Stafford, Laura (Proskauer Rose LLP); Wolf, Lucy C.; mbienenstock@proskauer.com; Dale, Margaret A. (Proskauer Rose LLP); Mervis, Michael T. (Proskauer Rose LLP); Possinger, Paul V. (Proskauer Rose LLP); Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP); Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP); Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP); thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP); Caton, Amy (Kramer Levin Naftalis & Frankel LLP); Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP); Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP); McKeen, Elizabeth L.; Mitchell, Nancy; Friedman, Peter; Yang, Roger; Roth, Joseph L. RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Subject:

Angela-

The relevant PREPA personnel are currently out of the office. We are hoping to have an update for you early next week.

Best, Ashley

O'Melveny

Ashley Pavel

<u>apavel@omm.com</u> O: +1-949-823-7138

O'Melveny & Myers LLP 610 Newport Center Drive, 17th Floor Newport Beach, CA 92660

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Exhibit 1 Page 3 of 10

Website | LinkedIn | Twitter

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Herring, Angela K. <AKHerring@wlrk.com> **Sent:** Wednesday, July 24, 2019 12:55 PM

To: Clark, Brandon C. <BClark@proskauer.com>; Bassett, Nicholas A. (Paul Hastings LLP)

<nicholasbassett@paulhastings.com>

Cc: Brian.Liegel@weil.com; Debora.Hoehne@weil.com; gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP) < jonathan.polkes@weil.com>; Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil, Gotshal & Manges LLP) <marcia.goldstein@weil.com>; Moshe.Fink@weil.com; National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP) <mcto@debevoise.com>; Bongartz, G. Alexander (Paul Hastings LLP) <alexbongartz@paulhastings.com>; Tenzer, Andrew V. (Paul Hastings LLP) <andrewtenzer@paulhastings.com>; Bliss, James R. (Paul Hastings LLP) < jamesbliss@paulhastings.com>; Worthington, James B. (Paul Hastings LLP) <jamesworthington@paulhastings.com>; lucdespins@paulhastings.com; Comerford, Michael (Paul Hastings LLP) <michaelcomerford@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Zwillinger, Zachary S. <zacharyzwillinger@paulhastings.com>; Wolf, Amy R. <ARWolf@WLRK.com>; Kleinhaus, Emil A. <EAKleinhaus@WLRK.com>; Celentino, Joseph C. <JCCelentino@wlrk.com>; Lynch, John F. <JLynch@wlrk.com>; Mason, Richard G. <RGMason@WLRK.com>; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP) <jamie.fell@stblaw.com>; sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP)

stpliedman@stblaw.com>; Baker, Nicolas (Simpson Thacher & Bartlett LLP) <nbaker@stblaw.com>; Qusba, Sandeep (Simpson Thacher & Bartlett LLP) <squsba@stblaw.com>; notificaciones@bufete-emmanuelli.com; rolando@bufeteemmanuelli.com; jessica@bufete-emmanuelli.com; lft@tcm.law; mfb@tcm.law; nperez@tcm.law; ebarak@proskauer.com; Carino, Elisa M. <ecarino@proskauer.com>; Mashberg, Gregg M. (Proskauer Rose LLP) <gmashberg@proskauer.com>; Jones, Jennifer L. <ilijones@proskauer.com>; Geary, Laura M. <LGeary@proskauer.com>; Stafford, Laura (Proskauer Rose LLP) stafford@proskauer.com; Wolf, Lucy C. stafford@proskauer.com; Wolf, mbienenstock@proskauer.com; Dale, Margaret A. (Proskauer Rose LLP) <mdale@proskauer.com>; Mervis, Michael T. (Proskauer Rose LLP) <mmervis@proskauer.com>; Possinger, Paul V. (Proskauer Rose LLP) <ppossinger@proskauer.com>; Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP) <ellen.halstead@cwt.com>; Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP) <howard.hawkins@cwt.com>; Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP) <mark.ellenberg@cwt.com>; thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP) <abyowitz@kramerlevin.com>; Caton, Amy (Kramer Levin Naftalis & Frankel LLP) <acaton@kramerlevin.com>; Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP) <ghorowitz@kramerlevin.com>; Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP) <tmayer@kramerlevin.com>; McKeen, Elizabeth L. <emckeen@omm.com>; Mitchell, Nancy <nmitchell@omm.com>; Friedman, Peter <pfriedman@omm.com>; Yang, Roger <ryang@omm.com>; Roth, Joseph L. <joeroth@omm.com>; Pavel, Ashley <apavel@omm.com>

Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley and Brandon,

Following up on our call on Monday, I'm writing to see if you have any update on the diligence we discussed concerning the existence of communications with PREB, among any of the RSA parties, or within PREPA relating to the Rate Motion.

Regards,

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc: Exhibit 1 Page 4 of 10

Angie

Angela K. Herring

Wachtell, Lipton, Rosen & Katz
51 West 52nd Street | New York, NY 10019
+1 (212) 403-1141 (Direct) | +1 (212) 403-2141 (Fax)
AKHerring@wlrk.com | www.wlrk.com

From: Herring, Angela K.

Sent: Monday, July 22, 2019 7:56 AM

To: 'Clark, Brandon C.' <BClark@proskauer.com>; Bassett, Nicholas A. (Paul Hastings LLP)

<nicholasbassett@paulhastings.com>

Cc: Brian.Liegel@weil.com; Debora.Hoehne@weil.com; gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP) < jonathan.polkes@weil.com>; Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil, Gotshal & Manges LLP) <marcia.goldstein@weil.com>; Moshe.Fink@weil.com; National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP) < mcto@debevoise.com >; Bongartz, G. Alexander (Paul Hastings LLP) <alexbongartz@paulhastings.com>; Tenzer, Andrew V. (Paul Hastings LLP) <andrewtenzer@paulhastings.com>; Bliss, James R. (Paul Hastings LLP) < <u>jamesbliss@paulhastings.com</u>>; Worthington, James B. (Paul Hastings LLP) <jamesworthington@paulhastings.com>; Despins, Luc A. (Paul Hastings LLP) <lucdespins@paulhastings.com>; Comerford, Michael (Paul Hastings LLP) <michaelcomerford@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Zwillinger, Zachary S. <zacharyzwillinger@paulhastings.com>; Wolf, Amy R. <ARWolf@WLRK.com>; Kleinhaus, Emil A. <EAKleinhaus@WLRK.com>; Celentino, Joseph C. <JCCelentino@wlrk.com>; Lynch, John F. <JLynch@wlrk.com>; Mason, Richard G. <RGMason@WLRK.com>; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP) <jamie.fell@stblaw.com>; sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) < bfriedman@stblaw.com >; Baker, Nicolas (Simpson Thacher & Bartlett LLP) <nbaker@stblaw.com>; Qusba, Sandeep (Simpson Thacher & Bartlett LLP) <sgusba@stblaw.com>; notificaciones@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; Ift@tcm.law; mfb@tcm.law; nperez@tcm.law; Barak, Ehud (Proskauer Rose LLP) <ebarak@proskauer.com>; Carino, Elisa M. <ecarino@proskauer.com>; Mashberg, Gregg M. (Proskauer Rose LLP) <gmashberg@proskauer.com>; Jones, Jennifer L. <ili>jljones@proskauer.com>; Geary, Laura M. <LGeary@proskauer.com>; Stafford, Laura (Proskauer Rose LLP) <lstafford@proskauer.com>; Wolf, Lucy C. <lwolf@proskauer.com>; Bienenstock, Martin J. (Proskauer Rose LLP) <mbienenstock@proskauer.com>; Dale, Margaret A. (Proskauer Rose LLP) <mdale@proskauer.com>; Mervis, Michael T. (Proskauer Rose LLP) <mmervis@proskauer.com>; Possinger, Paul V. (Proskauer Rose LLP) <ppossinger@proskauer.com>; Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP) <ellen.halstead@cwt.com>; Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP) <howard.hawkins@cwt.com>; Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP) <mark.ellenberg@cwt.com>; thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP) <abyowitz@kramerlevin.com>; Caton, Amy (Kramer Levin Naftalis & Frankel LLP) <acaton@kramerlevin.com>; Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP) <ghorowitz@kramerlevin.com>; Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP) <tmayer@kramerlevin.com>; McKeen, Elizabeth L. <emckeen@omm.com>; Mitchell, Nancy A. (O'Melveny & Myers LLP) <nmitchell@omm.com>; Friedman, Peter M. (O'Melveny & Myers LLP) <pfriedman@omm.com>; Yang, Roger <ryang@omm.com>; Roth, Joseph L. <joeroth@omm.com>; Pavel, Ashley <apavel@omm.com> Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Brandon,

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc: Exhibit 1 Page 5 of 10

The issue we wish to discuss is the Government Parties' refusal to provide any discovery on the rate motion, which seeks to offset the RSA's Settlement Charge by reducing base rates. We believe the discovery we've requested is relevant to the 9019 motion, and your objection as to timeliness is misplaced in light of the failure of the Government Parties to let our clients know about the rate motion before the deadline you're seeking to invoke. We look forward to discussing these issues at 5:00 pm.

Regards, Angie

Angela K. Herring

Wachtell, Lipton, Rosen & Katz
51 West 52nd Street | New York, NY 10019
+1 (212) 403-1141 (Direct) | +1 (212) 403-2141 (Fax)
AKHerring@wlrk.com | www.wlrk.com

From: Clark, Brandon C. < <u>BClark@proskauer.com</u>>

Sent: Sunday, July 21, 2019 12:18 AM

To: Bassett, Nicholas A. (Paul Hastings LLP) < nicholasbassett@paulhastings.com >; Herring, Angela K.

<<u>AKHerring@wlrk.com</u>>

Cc: Brian.Liegel@weil.com; Debora.Hoehne@weil.com; gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP) < jonathan.polkes@weil.com>; Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil, Gotshal & Manges LLP) <marcia.goldstein@weil.com>; Moshe.Fink@weil.com; National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP) <mcto@debevoise.com>; Bongartz, G. Alexander (Paul Hastings LLP) <alexbongartz@paulhastings.com>; Tenzer, Andrew V. (Paul Hastings LLP) <andrewtenzer@paulhastings.com>; Bliss, James R. (Paul Hastings LLP) < jamesbliss@paulhastings.com>; Worthington, James B. (Paul Hastings LLP) <jamesworthington@paulhastings.com>; Despins, Luc A. (Paul Hastings LLP) <lucdespins@paulhastings.com>; Comerford, Michael (Paul Hastings LLP) <michaelcomerford@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Zwillinger, Zachary S. <zacharyzwillinger@paulhastings.com>; Wolf, Amy R. <ARWolf@WLRK.com>; Kleinhaus, Emil A. <EAKleinhaus@WLRK.com>; Celentino, Joseph C. <JCCelentino@wlrk.com>; Lynch, John F. <JLynch@wlrk.com>; Mason, Richard G. <RGMason@WLRK.com>; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP) <jamie.fell@stblaw.com>; sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) bfriedman@stblaw.com; Baker, Nicolas (Simpson Thacher & Bartlett LLP) <nbaker@stblaw.com>; Qusba, Sandeep (Simpson Thacher & Bartlett LLP) <sgusba@stblaw.com>; notificaciones@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; Ift@tcm.law; mfb@tcm.law; nperez@tcm.law; Barak, Ehud (Proskauer Rose LLP) <ebarak@proskauer.com>; Carino, Elisa M. <ecarino@proskauer.com>; Mashberg, Gregg M. (Proskauer Rose LLP) <gmashberg@proskauer.com>; Jones, Jennifer L. <ili>jljones@proskauer.com>; Geary, Laura M. <LGeary@proskauer.com>; Stafford, Laura (Proskauer Rose LLP) <lstafford@proskauer.com>; Wolf, Lucy C. <lwolf@proskauer.com>; Bienenstock, Martin J. (Proskauer Rose LLP) <mbienenstock@proskauer.com>; Dale, Margaret A. (Proskauer Rose LLP) <mdale@proskauer.com>; Mervis, Michael T. (Proskauer Rose LLP) <mmervis@proskauer.com>; Possinger, Paul V. (Proskauer Rose LLP) <ppossinger@proskauer.com>; Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP) <ellen.halstead@cwt.com>; Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP) <howard.hawkins@cwt.com>; Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP) <mark.ellenberg@cwt.com>; thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP) <abyowitz@kramerlevin.com>; Caton, Amy (Kramer Levin Naftalis & Frankel LLP) <acaton@kramerlevin.com>; Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP) <ghorowitz@kramerlevin.com>; Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP) <tmayer@kramerlevin.com>; McKeen, Elizabeth L. <emckeen@omm.com>; Mitchell, Nancy A. (O'Melveny & Myers LLP) <nmitchell@omm.com>; Friedman, Peter M. (O'Melveny & Myers LLP) <pfriedman@omm.com>; Yang, Roger

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc: Exhibit 1 Page 6 of 10

<ryang@omm.com>; Roth, Joseph L. <<u>joeroth@omm.com</u>>; Pavel, Ashley <<u>apavel@omm.com</u>>

Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

*** EXTERNAL EMAIL ***

Angela & Nick ~

In order for us to most effectively use our time during the meet-and-confer that has been scheduled for Monday afternoon, we ask that you provide us advance notice of the issues you wish to discuss relating to the Government Parties' responses to discovery requests.

Thanks, Brandon

Brandon C. Clark

Associate

Proskauer

Three First National Plaza
70 West Madison
Suite 3800
Chicago, IL 60602-4342
d 312.962.3537 | f 312.962.3445
bclark@proskauer.com

Visit our Policyholder Insurance Law Blog: http://www.insuranceriskrecovery.com

greenspaces

Please consider the environment before printing this email.

From: Pavel, Ashley <apavel@omm.com>
Sent: Saturday, July 20, 2019 1:17 PM

To: Bassett, Nicholas <nicholasbassett@paulhastings.com>

Cc: Herring, Angela K. <AKHerring@wlrk.com>; Brian.Liegel@weil.com; Debora.Hoehne@weil.com;

gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal &

Manges LLP) < jonathan.polkes@weil.com>; Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil,

Gotshal & Manges LLP) <marcia.goldstein@weil.com>; Moshe.Fink@weil.com;

National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com;

robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP)

<mcto@debevoise.com>; Bongartz, Alex <alexbongartz@paulhastings.com>; Tenzer, Andrew V.

<andrewtenzer@paulhastings.com>; Bliss, James R. <jamesbliss@paulhastings.com>; Worthington, James B.

<jamesworthington@paulhastings.com>; lucdespins@paulhastings.com; Comerford, Mike

<michaelcomerford@paulhastings.com>; Jimenez, Pedro pedrojimenez@paulhastings.com>; Zwillinger, Zachary S.

<zacharyzwillinger@paulhastings.com>; Wolf, Amy R. <ARWolf@wlrk.com>; Kleinhaus, Emil A.

<EAKleinhaus@wlrk.com>; Celentino, Joseph C. <JCCelentino@wlrk.com>; Lynch, John F. <JLynch@wlrk.com>; Mason,

Richard G. < RGMason@wlrk.com >; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP)

<jamie.fell@stblaw.com>; sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP)

<<u>bfriedman@stblaw.com</u>>; Baker, Nicolas (Simpson Thacher & Bartlett LLP) <<u>nbaker@stblaw.com</u>>; Qusba, Sandeep

(Simpson Thacher & Bartlett LLP) <squsba@stblaw.com>; notificaciones@bufete-emmanuelli.com; rolando@bufete-

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc: Exhibit 1 Page 7 of 10

Angela and Nick-O'Melveny and Proskauer can talk at 5 on Monday. If that works for the Fuel Line Lenders and the Committee, please circulate a calendar invitation.

On Jul 20, 2019, at 8:56 AM, Bassett, Nicholas < <u>nicholasbassett@paulhastings.com</u>> wrote:

The Committee requests to participate in the meet and confer as well.

Nick Bassett
Of Counsel
Paul Hastings LLP
875 15th Street, N.W.<x-apple-data-detectors://1/1>
Washington, DC 20005<x-apple-data-detectors://1/1>
202.551.1902<<u>tel:202.551.1902</u>>

On Jul 20, 2019, at 11:53 AM, Herring, Angela K. < <u>AKHerring@wlrk.com</u>
wlrk.com
wmilto: AKHerring@wlrk.com

wrote:

Counsel:

Please let us know your availability on Monday afternoon or Tuesday to meet and confer concerning the Government Parties' responses and objections served last night. We'd like to discuss as soon as possible, as we will move to compel absent a resolution.

Regards,

Angela K. Herring
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street | New York, NY 10019
+1 (212) 403-1141 (Direct) | +1 (212) 403-2141 (Fax)
AKHerring@wlrk.com<mailto:AKHerring@wlrk.com> | www.wlrk.com

From: Pavel, Ashley <apavel@omm.com<mailto:apavel@omm.com>>>

Sent: Friday, July 19, 2019 7:00 PM

To: <u>Brian.Liegel@weil.com<mailto:Brian.Liegel@weil.com></u>;

```
Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc:
                                      Exhibit 1 Page 8 of 10
Debora.Hoehne@weil.com<mailto:Debora.Hoehne@weil.com>;
gregory.silbert@weil.com<mailto:gregory.silbert@weil.com>;
Jeremy.Auster@weil.com<mailto:Jeremy.Auster@weil.com>;
Jeremy.Cain@weil.com<mailto:Jeremy.Cain@weil.com>; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP)
<ionathan.polkes@weil.com<mailto:jonathan.polkes@weil.com>>;
Lara.Ting@weil.com<mailto:Lara.Ting@weil.com>;
lauren.haiken@weil.com<mailto:lauren.haiken@weil.com>; Goldstein, Marcia L. (Weil, Gotshal & Manges
LLP) <marcia.goldstein@weil.com<mailto:marcia.goldstein@weil.com>>;
Moshe.Fink@weil.com<mailto:Moshe.Fink@weil.com>;
National.Puerto.Rico.Receiver.Litigation.Team@weil.com<mailto:National.Puerto.Rico.Receiver.Litigation.Te
am@weil.com>; remmanuelli@me.com<mailto:remmanuelli@me.com>;
Reed.Collins@weil.com<mailto:Reed.Collins@weil.com>;
robert.berezin@weil.com<mailto:robert.berezin@weil.com>;
eworenklein@debevoise.com<mailto:eworenklein@debevoise.com>; To, My Chi (Debevoise & Plimpton LLP)
<mcto@debevoise.com<mailto:mcto@debevoise.com>>; Bongartz, G. Alexander (Paul Hastings LLP)
<alexbongartz@paulhastings.com<mailto:alexbongartz@paulhastings.com>>: Tenzer, Andrew V. (Paul
Hastings LLP) <andrewtenzer@paulhastings.com<mailto:andrewtenzer@paulhastings.com>>; Bliss, James R.
(Paul Hastings LLP) < jamesbliss@paulhastings.com < mailto:jamesbliss@paulhastings.com >>; Worthington,
James B. (Paul Hastings LLP)
```

<iamesworthington@paulhastings.com<mailto:jamesworthington@paulhastings.com>>; Despins, Luc A. (Paul Hastings LLP) < lucdespins@paulhastings.com < mailto:lucdespins@paulhastings.com >>; Comerford, Michael (Paul Hastings LLP) <michaelcomerford@paulhastings.com<mailto:michaelcomerford@paulhastings.com>>; Bassett, Nicholas A. (Paul Hastings LLP)

<nicholasbassett@paulhastings.com<mailto:nicholasbassett@paulhastings.com>>;

pedrojimenez@paulhastings.com<mailto:pedrojimenez@paulhastings.com>;

zacharyzwillinger@paulhastings.com<mailto:zacharyzwillinger@paulhastings.com>; Herring, Angela K.

<AKHerring@wlrk.com<mailto:AKHerring@wlrk.com>>; Wolf, Amy R.

<ARWolf@WLRK.com<mailto:ARWolf@WLRK.com>>; Kleinhaus, Emil A.

<EAKleinhaus@WLRK.com<mailto:EAKleinhaus@WLRK.com>>; Celentino, Joseph C.

<JCCelentino@wlrk.com<mailto:JCCelentino@wlrk.com>>; Lynch, John F.

<JLynch@wlrk.com<mailto:JLynch@wlrk.com>>; Mason, Richard G.

<RGMason@WLRK.com<mailto:RGMason@WLRK.com>>;

edward.linden@stblaw.com<mailto:edward.linden@stblaw.com>; Fell, Jamie (Simpson Thacher & Bartlett LLP) <iamie.fell@stblaw.com<mailto:jamie.fell@stblaw.com>>;

sarah.phillips@stblaw.com<mailto:sarah.phillips@stblaw.com>; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) bfriedman@stblaw.com>; Baker, Nicolas (Simpson Thacher & Bartlett LLP) <nbaker@stblaw.com<mailto:nbaker@stblaw.com>>; Qusba, Sandeep (Simpson Thacher &

Bartlett LLP) <squsba@stblaw.com<mailto:squsba@stblaw.com>>; notificaciones@bufete-

emmanuelli.com<mailto:notificaciones@bufete-emmanuelli.com>; rolando@bufeteemmanuelli.com<mailto:rolando@bufete-emmanuelli.com>; jessica@bufete-

emmanuelli.com<mailto:jessica@bufete-emmanuelli.com>; lft@tcm.law<mailto:lft@tcm.law>;

mfb@tcm.law<mailto:mfb@tcm.law>; nperez@tcm.law<mailto:nperez@tcm.law>

Cc: bclark@proskauer.com<mailto:bclark@proskauer.com>; Barak, Ehud (Proskauer Rose LLP)

<ebarak@proskauer.com<mailto:ebarak@proskauer.com>>:

ecarino@proskauer.com<mailto:ecarino@proskauer.com>; Mashberg, Gregg M. (Proskauer Rose LLP)

<gmashberg@proskauer.com<mailto:gmashberg@proskauer.com>>;

iliones@proskauer.com<mailto:iliones@proskauer.com>:

LGeary@proskauer.com<mailto:LGeary@proskauer.com>; Stafford, Laura (Proskauer Rose LLP)

<lstafford@proskauer.com<mailto:lstafford@proskauer.com>>:

lwolf@proskauer.com<mailto:lwolf@proskauer.com>; Bienenstock, Martin J. (Proskauer Rose LLP)

<mbienenstock@proskauer.com<mailto:mbienenstock@proskauer.com>>; Dale, Margaret A. (Proskauer Rose

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc: Exhibit 1 Page 9 of 10

LLP) < mdale@proskauer.com < mailto:mdale@proskauer.com >> ; Mervis, Michael T. (Proskauer Rose LLP) < mmervis@proskauer.com < mailto:mmervis@proskauer.com >> ; Possinger, Paul V. (Proskauer Rose LLP)

<ppossinger@proskauer.com<mailto:ppossinger@proskauer.com>>;

Bill.Natbony@cwt.com<mailto:Bill.Natbony@cwt.com>;

<u>casey.servais@cwt.com<mailto:casey.servais@cwt.com</u>>; Halstead, Ellen (Cadwalader, Wickersham & Taft

LLP) < <u>ellen.halstead@cwt.com</u>< ; Hawkins, Howard R. (Cadwalader,

Wickersham & Taft LLP) < howard.hawkins@cwt.com < mailto:howard.hawkins@cwt.com >> ; Ellenberg, Mark

C. (Cadwalader, Wickersham & Taft LLP) < <u>mark.ellenberg@cwt.com</u></br>
; thomas.curtin@cwt.com
mailto:thomas.curtin@cwt.com
;

devlawoffices@gmail.com<mailto:devlawoffices@gmail.com>;

<u>NHamerman@KRAMERLEVIN.com</u><, Byowitz, Alice J.

(Kramer Levin Naftalis & Frankel LLP) < <u>abyowitz@kramerlevin.com</u> < rankel LLP) < Caton, Amy (Kramer Levin Naftalis & Frankel LLP)

<acaton@kramerlevin.com<mailto:acaton@kramerlevin.com>>>; Horowitz, Gregory Aaron (Kramer Levin

Naftalis & Frankel LLP) < <u>ghorowitz@kramerlevin.com</u> < <u>mailto:ghorowitz@kramerlevin.com</u> >>; Mayer,

Thomas Moers (Kramer Levin Naftalis & Frankel LLP)

<tmayer@kramerlevin.com<mailto:tmayer@kramerlevin.com>>; McKeen, Elizabeth L.

<emckeen@omm.com<mailto:emckeen@omm.com>>>; Mitchell, Nancy A. (O'Melveny & Myers LLP)

<<u>nmitchell@omm.com</u></ri>
Striedman, Peter M. (O'Melveny & Myers LLP)

friedman@omm.com<mailto:pfriedman@omm.com</pre>>>; Yang, Roger

<ryang@omm.com<mailto:ryang@omm.com</pre>>>; Roth, Joseph L.

<joeroth@omm.com<mailto:joeroth@omm.com<>>

Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

*** EXTERNAL EMAIL ***

Counsel-

Please see the attaches responses and objections to the discovery requests served on AAFAF and PREPA by the Fuel Line Lenders on July 15, 2019 and the UCC on July 16, 2019.

O'Melveny

Ashley Pavel

apavel@omm.com<mailto:apavel@omm.com>

O: +1-949-823-7138

O'Melveny & Myers LLP

610 Newport Center Drive, 17th Floor

Newport Beach, CA 92660

Website<https://urldefense.proofpoint.com/v2/url?u=http-3A_www.omm.com_&d=DwMF-g&c=tW-

ilfpr9ieM0wGTsomX9fiG4287KTRkOdgBzDCW-

vs&r=01B0WpOSWnZL7ld7hAPDcK2aiY0ijZOpw8eTLaaletk&m=vEuTirZrg4yXblRhwasNxX1sUM4jUZR

D17omuMXEeTU&s=7069sCAp6GLX2122qsVBZ-SHhl8UckrmvdmGurooZOO&e=>|

LinkedIn<https://urldefense.proofpoint.com/v2/url?u=https-3A www.linkedin.com company o-27melveny-

2D-26-2Dmyers-2Dllp&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-

vs&r=01B0WpOSWnZL7ld7hAPDcK2aiY0ijZOpw8eTLaaletk&m=vEuTirZrg4yXblRhwasNxX1sUM4jUZR

D17omuMXEeTU&s=fFNi042a0hFWbim74XaDPKFyxEKQ3tvtqOaX9avr8TI&e=> |

Case:17-03283-LTS Doc#:8436-1 Filed:08/09/19 Entered:08/09/19 19:34:29 Desc: Exhibit 1 Page 10 of 10

Twitterhttps://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/url?u=https-3A_twitter.com_omelvenymyers&d=DwMF-g&c=tW-ilfpr9ieM0wGTsomX9fiG4287KTRkQdqBzDCW-">https://urldefense.proofpoint.com/v2/urldefense.proofpoint.

vs&r=01B0WpOSWnZL7ld7hAPDcK2aiY0ijZOpw8eTLaaletk&m=vEuTirZrg4yXblRhwasNxX1sUM4jUZRD17omuMXEeTU&s=gxzkES5EphKFsT1vDQrBhhN4OujmnRdadTEq49tDnLw&e=>

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

Please be advised that this transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, please do not read, copy or re-transmit this communication. If you have received this communication in error, please notify us by e-mail (helpdesk@wlrk.com) or by telephone (call us collect at 212-403-4357) and delete this message and any attachments.

Thank you in advance for your cooperation and assistance.
======================================

This message and its attachments are sent from a law firm and may contain information that is confidential and protected by privilege from disclosure.

If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving them. Please delete the message and attachments without printing, copying, forwarding or saving them, and notify the sender immediately.
